

Fill in this information to identify the case:

Debtor 1 RICARDO A READ-BAEZ

Debtor 2

United States Bankruptcy Court for the MIDDLE District of

Pennsylvania

Case number 18-02041 HWV

Form 4100R

## Response to Notice of Final Cure Payment

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

### Part 1: Mortgage Information

Name of creditor: TOWNE MORTGAGE COMPANY

Court claim no. (if known)

1

Last 4 digits of any number you use to identify the debtor's account: 0620

Property address: 390 HILL N DALE DR. SOUTH

Number, Street

YORK, PA 17403

City, State, Zip

### Part 2: Pre-petition Default Payments

*Check one:*

☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure pre-petition default on the creditor's claim

☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the pre-petition default on the creditor's claim. Creditor asserts that the total pre-petition amount remaining unpaid as of the date of this response is:

### Part 3: Post-petition Mortgage Payment

*Check one:*

☒ Creditor states that the debtor(s) are current with all post-petition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next post-petition payment from the debtor(s) is due on: 08/01/2025

☐ Creditor states that the debtor(s) are not current on all post-petition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is: (a) \$.00

a. Total post-petition ongoing payments due: (b) \$.00

b. Total fees, charges, expenses, escrow, and costs outstanding: (c) \$.00

c. Total. Add lines a and b.

Creditor asserts that the debtor(s) are contractually obligated for the post-petition payment(s) that first became due on:

**Part 4: Itemized Payment History**

If the creditor disagrees in Part 2 that the pre-petition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all post-petition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☒ all payments received;
- ☒ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☒ all amounts the creditor contends remain unpaid.

**Part 5: Sign Here**

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.

*Check the appropriate box:*

- ☐ I am the creditor.
- ☒ I am the creditor's authorized agent.

**I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.**

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

☒ /s/Tammy Terrell Benoza Date 08/07/2025  
Signature

**Print:** TAMMY TERRELL BENOZA, ESQ. Title ATTORNEY FOR SECURED CREDITOR  
First name Middle name Last name

Company FEIN, SUCH,KAHN & SHEPARD, P.C.

Address 7660 IMPERIAL WAY, SUITE 121  
Number Street

ALLENTOWN, PA, 18195  
City

State

ZIP Code

Contact (610) 395-3535  
phone

Email bankruptcy@fskslaw.com

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA (HARRISBURG)

IN RE:	Case No.: 18-02041 HWV
RICARDO A READ-BAEZ,	Chief Judge Henry W. Van Eck
Debtor(s)	Chapter: 13

**CERTIFICATION OF SERVICE**

I, Ruth Essington:

☐ represent the \_\_\_\_\_ in this matter.

☒ am the secretary/paralegal for Fein, Such, Kahn & Shepard, PC, who represents the  
Secured Creditor, TOWNE MORTGAGE COMPANY in this matter.

☐ am the \_\_\_\_\_ in the above case and am representing myself.

On August 11, 2025, this office caused to be mailed a copy of the following pleadings and/or documents to the parties listed in the chart below:

a. Response to Trustee's Notice of Final Cure

I hereby certify that copies of Response to Trustee's Notice of Final Cure was served by ECF notice (electronically) upon:

<b><u>Debtor's Counsel:</u></b>  Gary J Imblum Imblum Law Offices, P.C. 4615 Derry Street Harrisburg, PA 17111	<b><u>Assistant US Trustee:</u></b>  Asst. U.S. Trustee United States Trustee US Courthouse 1501 N. 6th St Harrisburg, PA 17102
<b><u>Trustee:</u></b>  Jack N Zaharopoulos Standing Chapter 13 Trustee 8125 Adams Drive, Suite A Hummelstown, PA 17036	

This office caused to be mailed a copy of this pleading by regular mail the same in a sealed envelope, with postage prepaid thereon, addressed to the last known addresses as indicated below:

**Debtor(s):**

Ricardo A. Read-Baez  
390 Hill N. Dale Drive S  
York, PA 17403

I hereby certify under penalty of perjury that the above documents were sent using the mode of service indicated.

Date: 08/11/25

/s/Ruth Essington  
Paralegal